

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CASE NO.: 3:21-CR-253-MOC--DCK**

UNITED STATES OF AMERICA

v.

MICHAEL MANDEL BALDWIN

CONSENT MOTION TO CONTINUE DOCKET CALL

NOW COMES defendant Michael Mandel Baldwin, through counsel, and moves to continue the docket call in this matter from May 2, 2022. In support of this motion, the defense shows:

1. The Government consents to this motion.
2. Additional documents have been recently discovered and produced to the Government that may have bearing on the potential resolution of this case.
3. In the event resolution is not possible, this matter will proceed to trial and defense counsel needs additional time to adequately prepare.

For the foregoing reasons, the Defense requests that this matter be continued from the May 2, 2022 trial term and set for trial at a time convenient to the Court.

Dated: April 14, 2022.

Respectfully submitted,

/s/ C. Melissa Owen

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she has served the foregoing CONSENT MOTION TO CONTINUE DOCKET CALL with the Clerk of Court using the CM/ECF system, which will send notification of such filing to opposing counsel:

Assistant U.S. Attorney
caryn.finley@usdoj.gov

Dated: April 14, 2022

/s/ C. Melissa Owen